

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

VICTOR STANLEY, INC.,

*

Plaintiff

*

v.

*

Civil Action No. 8:06-cv-02662-MJG

CREATIVE PIPE, INC., *et al.*

*

Defendants

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**MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO
JANUARY 24, 2011 MEMORANDUM AND ORDER AND TO STAY
OPERATION OF ORDER UNTIL RULING ON OBJECTIONS**

Defendants Mark Pappas and Creative Pipe, Inc. request that this Court extend the time for them to file objections to the Memorandum and Order issued by Magistrate Judge Paul Grimm on January 24, 2011 (ECF No. 448). The grounds for this motion are:

1. Pursuant to Local Rule 301(b), objections to dispositive matters decided by a Magistrate Judge must be served and filed within fourteen (14) days of entry of the Magistrate Judge's Order.
2. Magistrate Grimm's Order requires the Defendants to pay an additional \$712,053.67 to Plaintiff within thirty (30) days of the Order. Pursuant to an Order previously entered by this Court, if the money is not paid within the prescribed time, Defendant Mark Pappas could face civil contempt charges for failure to comply with the payment order, ECF No. 397, p. 4.

3. As the Court knows, counsel for Defendants have and will be focused on the trial of this case during the time period prescribed for filing objections.

4. Counsel for Defendants need additional time to file objections to Magistrate Judge Grimm's Memorandum and Order. Counsel for Defendants respectfully request that the time for filing objections be extended by an additional fourteen (14) days.

5. Counsel for Defendants further request that this Court stay the operation of Magistrate Grimm's January 24, 2011 Order until this Court rules on Defendants' objections.

6. It is unknown when this Court will decide the objections filed by Defendants. There is a possibility that the 30 day requirement from January 24, 2011 to pay the award will occur before this Court rules on Defendants' objections.

7. In the event this Court reduces the amount of attorney's fees and costs to be paid to Plaintiff, this will directly affect the issue of whether Defendant Pappas can pay the attorneys fees and costs awarded or face the possibility of civil contempt charges.

WHEREFORE, it is respectfully requested that this Court extend the time Defendants have to file objections to the January 24, 2011 Memorandum and Order of Magistrate Judge Paul Grimm by fourteen (14) days and stay the operation of Judge Grimm's Order until such time as this Court rules on Defendants' objections.

Respectfully submitted,

/s/ James A. Rothschild

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Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was served in accordance with the ECF procedures of this Court.

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